

EXHIBIT A



CERTIFICATE OF TRANSLATION OF FOREIGN DOCUMENT

*I, the undersigned, **HELLEN MARY SPANKIE de RIVERA**, the holder of Identity Card N° V-5.313.000, a Public Interpreter of the Republic of Venezuela in the English language, according to Title N° 1162 issued by the Ministry of Justice of the Republic of Venezuela on March 17th, 1993, registered at the Main Public Registry of the Federal District on August 10th, 1993, under N° 15, Page N° 15, Volume 3-A, and at the Lower Court First for Family and Minors on September 15th, 1993, under N° 55, Page N° 124, Letter "S", and published in Official Gazette N° 35318 dated October 15th, 1993, and with the Public Interpreters Association on November 10th, 1993; also registered with the Consular Sections of the Embassies for the U.K., the U.S.A., and Canada, and the Australian Commercial Office in Caracas; **DO HEREBY CERTIFY** that I am duly qualified and competent in the English and Spanish languages, and that the translation of the accompanying document presented to me for translation, rendered from the Spanish into the English language, is true and accurate and textually reads as follows:*

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

THOR HALVORSEN,

Plaintiff

Civil Action
No. 18-2683 (JMA) (AYS)

- against -

Glenn R. SIMPSON, Peter FRITSCH,
Francisco D'AGOSTINO-CASADO,
Leopoldo A. BETANCOURT-LÓPEZ,
Pedro José TREBBAU-LÓPEZ,
Francisco CONVIT-GURUCEAGA

Defendants

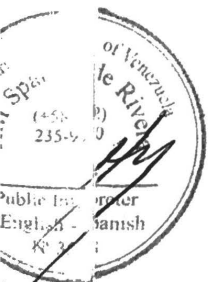
DECLARATION OF KELVIN VIVAS

Kelvin VIVAS declares under penalty of perjury under the laws of the United States of America:

1. I worked as a private bodyguard for Alejandro BETANCOURT-LOPEZ and Derwick from June 2009 to February 2017.
2. I have never worked for Venezuela's state police or for any other Venezuelan government agency. As far as I know, no one else who worked with me in security for Derwick or Mr. BETANCOURT worked for the Venezuelan government.
3. I have carried machine guns only in training courses in Venezuela and Argentina, and only lawfully. The pictures of me with automatic weapons attached to Thor HALVORSEN's Declaration were taken at training courses. I do not know of anyone who worked for Derwick or Mr. BETANCOURT using automatic weapons unlawfully.
4. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

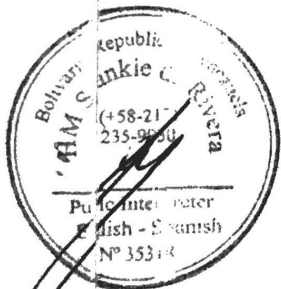
Executed on August 17, 2018, in Caracas, Venezuela.

Kelvin VIVAS



This translation is true to the attached original document written in the Spanish language, which I make upon request of the interested party, IN WITNESS WHEREOF I hereby set my hand and stamp in Caracas, today, August 17th, 2018.

Hellen Mary Spankie de Rivera
Public Interpreter – Caracas/Venezuela
hellenspankie@gmail.com



CORTE DISTRITAL DE LOS ESTADOS UNIDOS DE AMÉRICA
DISTRITO ESTE DE NUEVA YORK

Acción Civil
N° 18-2683 (JMA) (AYS)

Thor HALVORSEN

Demandante

contra

Glenn R. SIMPSON, Peter FRITSCH,
Francisco D'AGOSTINO-CASADO,
Leopoldo A. BETANCOURT-LÓPEZ,
Pedro José TREBBAU-LÓPEZ,
Francisco CONVIT-GURUCEAGA

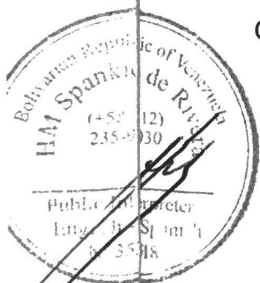
Demandados

DECLARACIÓN DE KELVIN VIVAS

KELVIN VIVAS declara, so pena de perjurio conforme a la legislación de los Estados Unidos de América:

1. Trabajé como Guardaespaldas privado de Alejandro BETANCOURT-LÓPEZ y Derwick desde Junio de 2009 a Febrero de 2017.
2. Jamás trabajé para la policía estatal de Venezuela ni para otra dependencia gubernamental venezolana. A mi mejor saber, ninguno de los que trabajaron conmigo en la seguridad de Derwick o del Sr. Betancourt trabajaron para el gobierno de Venezuela.
3. He portado ametralladoras solamente en los cursos de entrenamiento en Venezuela y en Argentina y sólo legalmente. Las fotografías de mi persona con armas automáticas que van adjuntas a la Declaración de Thor HALVORSEN fueron tomadas en los cursos de entrenamiento. No conozco a nadie que haya trabajado para Derwick o para el Sr. Betancourt que use armas automáticas ilegalmente.
4. Declaro so pena de perjurio conforme a la legislación de los Estados Unidos de América que lo antedicho es cierto y correcto.

Otorgado el día 17 de Agosto de 2018, en Caracas, Venezuela.



KELVIN VIVAS